

Remarks

The Examiner will see that the applicants have amended the claims of the present invention in a manner which is believed to address all of the Examiner's rejections.

The Examiner cites US 006725265B1 (Challenger et al) under 35 USC §102(e) as anticipating claims 1, 4-10, 12, 15-21, 23, 27-32, 55 and 58-85. Applicants respectfully disagree for the following reasons.

Generally speaking, Challenger relates to a method and system for caching customized information. The objective of caching objects is to incur "significantly less overhead than recalculating the object or fetching the object from a remote location" (col 1, lines 17-19, also see col 5, lines 40-46). According to Challenger, "conventional caches store the actual objects to be returned to clients. [In Challenger] the cache 106 stores customizable templates (CTs), which are objects whose content has only been partially specified." (col 5, lines 49-52).

The Examiner will appreciate that applicants' invention is not directed to improved caching systems but to personalization of content provided to a user through the use of a data manipulation server, disposed in-line between the content providing server and a client equipment unit, which server is provided with personal data relating to the user. The advantage of the present invention is that the user may obtain personalized content from a number of different content providing servers without having to continuously provide personal data to each new content providing server with which the user wishes to interact (whether such personal data is to be stored at the content providing server or in the form of a cookie set at the client equipment unit by the content providing server). Thus, a single set of personal data relating to the user is stored in respect of a number of content providing servers resulting in increased security of the data and improved control, in particular allowing the user to update the personal data centrally thereby obviating the need to update the

numerous content providing servers or the cookies that they set. As a result, the user will experience a more consistent personalization of content.

As will be discussed in more detail below, Challenger does not address the same objectives as the present invention and does not teach the combination of features providing the solution as claimed in the present invention.

Regarding paragraph 3 of the Detailed Action, the Examiner asserts that "Challenger teaches of a client-server system where cache 106 stores customized information relating to the client 102". The Examiner is correct that cache 106 stores customized information which may relate to the client 102 in the sense that the client 102 may have requested the customized information. However, the customized information is clearly not personal data relating to the user of the client equipment unit as presently claimed. Rather, the customized information relating to the client 102 is content to be provided to the user. There is a clear distinction between the personalized content which is to be provided and the personal data relating to the user which enables such personalization.

Furthermore, the examiner argues that Challenger discloses "the data manipulation server intercepting a request message for obtaining the content, the request message being transmitted from the client equipment unit and addressed to the content providing server". The Examiner cites various references. Applicants have carefully checked each of the references cited by the Examiner but there is no indication that the cache 106 intercepts any request messages addressed to the content providing server. Rather, request messages are addressed to the cache 106 (see figure 5, block 502 and column 7, lines 32 to 37 where it states "a request for cached data is received by the cache 106 (step 502) conventional methods (e.g. look up in a cache directory) may be used to determine if the request then can be satisfied from the cache 106"). Thus, it cannot be said that Challenger teaches the

data manipulation server intercepting a request message ... addressed to the content providing server as presently claimed.

Furthermore, there is no teaching in Challenger that cache 106 is remote from the client equipment unit as presently claimed. In fact, Challenger suggests that the opposite should be true. The purpose of caching data as stated in Challenger and as one skilled in the art would understand, is to reduce the overhead for accessing a remote content providing server. Challenger states "in accessing the client 102, the server 104 may incur significant latency and/or other overhead (e.g. network overhead). To reduce the overhead for such accesses, information from the server 104 may be stored in the cache 106. The client 102 would then be able to obtain cached information from the server 104 with considerably less overhead." (col 5, lines 40-46). Thus, Challenger appears to teach away from the claimed invention of using a data manipulation server which is not only disposed in-line between the client equipment unit and the content providing server but also is remote from the client equipment unit.

Regarding paragraph 5 of the Detailed Action, the Examiner asserts that the personal data relating to the user is static data and quotes various passages of Challenger. The Examiner appears to have confused the use of static rules (RIBs) with personal data relating to the user. Furthermore, the Examiner asserts that the static data is obtained from the user and references the same passages in Challenger. Again, the Examiner appears to have confused the static rules used in Challenger with personal data relating to the user. The static rules of Challenger are not obtained from the user.

Similarly, in paragraph 6 of the Detailed Action, the Examiner asserts that Challenger discloses data relating to the user is dynamic data and cites the same references in Challenger. Again, the Examiner appears to be confusing the disclosure in

Challenger of dynamic rules with the personal data relating to the user of the present invention.

Also in paragraph 6 of the Detailed Action, the Examiner asserts that Challenger teaches that the dynamic data is obtained from an access or service provider associated with supporting communication between the client equipment unit and the content providing server. The Examiner again cites the very same passages as discussed above. The applicants have carefully reviewed the references but can find no teaching of this feature whatsoever. If the Examiner seriously intends to continue the rejection, applicants kindly request that he specifically indicate the text of Challenger which discloses these features. The applicants simply cannot find any basis for the rejection, as noted above.

In paragraph 7 of the Detailed Action, the Examiner asserts that Challenger teaches that the data manipulation server is arranged to modify the data communicated between the client equipment and the content providing server in dependence on a selected subset of the data relating to a user. The Examiner also asserts that Challenger teaches that data manipulation server is arranged to request the user of client equipment to select the subset in response to intercepting the request message and that Challenger teaches the data manipulation server is arranged to determine the subset independence on at least one rule of a user defined rule set. Again, the Examiner has cited the same passages as referenced above. The applicants have carefully reviewed these passages and can find no teaching of the features that the Examiner asserts are taught by Challenger. Again, the Examiner seriously intends to continue the rejection in respect of these features, applicants kindly request that he specifically identify the text in Challenger that is alleged to disclose these features.

In paragraph 8 of the Detailed Action, the Examiner asserts that Challenger teaches the data manipulation server is operated by an access or service provider associated

with supporting communications between the client equipment unit and the content providing server. Again, the Examiner cites the same passages referenced above. Again, the applicant has carefully reviewed these passages and can find no teaching of this feature. If the Examiner seriously intends to continue the rejection, he is again kindly requested to specifically identify the text of Challenger which is alleged to disclose this feature.

Turning to paragraph 11 of the Detailed Action, the Examiner rejects claims 2-3, 11, 13-14, 22, 33 and 56-57 under 35 USC §103(a) as being unpatentable over Challenger in view of US 006330561B1 (Cohen et al). Cohen discloses a method and apparatus for improving the efficiency of a cache. In particular, Cohen discloses that when a "proxy server sends a resource request [to a resource server] ... it also sends a proxy filter with the request. The proxy filter identifies certain criteria of interest to the proxy server with regard to any additional resources which might be in the same volume as the requested resource. ... A resource request response is then generated and sent back to the proxy server. Added to that response is information about additional resources selected from the volume using the proxy filter criteria. The proxy server upon receipt of this information from the resource server ... can then forward the appropriate requested resource to the requesting client and can update its proxy cache to indicate the extent to which already cached resources are valid or invalid. It can also make a determination whether to pre-fetch any of the additional resources identified in the appended additional information." (col 4, lines 4-25).

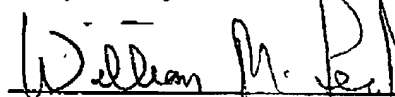
It is clear from this passage that the proxy filter sent with the request is not used to personalize the content requested by the requesting client, but rather to enable the proxy cache to determine to what extents its already cached resources are valid or invalid and possibly to pre-fetch additional resources which may or may not be requested by the user in future. Thus, it cannot be said that the request message is

modified thereby to personalize the content to be obtained by the client equipment unit as presently claimed in claims 2, 13 and 56.

For the reasons discussed above, applicants firmly believe that the present invention is patentably distinct from the prior art references raised by the Examiner and request favorable reconsideration. All other rejections are moot in view of the above, but, for the avoidance of doubt, the applicants make no admissions in respect of rejections not specifically addressed by this response.

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Respectfully submitted,



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